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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW Suite TW-A325  
Washington, DC 20554

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 5, 2009

Name of company(s) covered by this certification:  
Polar Communications Mutual Aid Corp., Polar Telcom Inc., Wolverton Telephone Co.

Form 499 Filer ID: 804486, 821498, 801093

Name of signatory: David L. Dunning

Title of signatory: General Manager/CEO, Executive Vice President

I, David L. Dunning, certify that I am an officer of the companies named above, and acting as an agent of the companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed 

Attachment

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